

Steven S. Kane, Esq., SBN: 061670
Bonnie E. Kane, Esq., SBN: 167700
THE KANE LAW FIRM
402 W. Broadway, Suite 2500
San Diego, CA 92101
Telephone: (619) 236-8700
Facsimile: (619) 236-1370
E-mail: skane@thekanelawfirm.com
E-mail: bonnie@thekanelawfirm.com

Attorneys for Morgan Engelbrecht

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

<i>In re:</i>) Case No. 19-30088 (DM)
PG&E CORPORATION)
-and-) Chapter 11
) (Lead Case)
) (Jointly Administered)
PACIFIC GAS AND ELECTRIC COMPANY)
Debtors.) DECLARATION OF MORGAN
) ENGELBRECHT IN SUPPORT OF
<input type="checkbox"/> Affects PG&E Corporation) MOTION PURSUANT TO FEDERAL
<input type="checkbox"/> Affects Pacific Gas & Electric) RULE OF BANKRUPTCY PROCEDURE
<input checked="" type="checkbox"/> Affects Both Debtors) 9006(b)(1)
) TO DEEM HER CLAIM TIMELY FILED
)
<i>All papers shall be filed in the Lead Case,</i>) Date: August 25, 2020
<i>No.19-30088 (DM)</i>) Time: 10:00 a.m.
) To Be Held Telephonically (or Via Video
) Where Approved and Applicable)
) Judge: Honorable Dennis Montali
)

I, Morgan Engelbrecht, hereby declare and state as follows:

1. This declaration is based upon my personal knowledge unless otherwise indicated. If called upon to testify as to the matters stated herein, I could and would competently do so.

2. At the time of the Camp Fire, I was living with my mother and father at 12502 Centerville Road, Chico, California where I had resided for approximately 16 years. The Camp Fire completely engulfed our community and property destroying numerous trees and personal property. Our home was spared due to my father and brothers fighting the fire.

3. On the morning of the fire I left for school. When I heard about the fire and tried to get home, the evacuation in place prevented me from getting back to or in touch with my parents. I was informed by a community web site that my family had died in the fire. For several hours I had no communication with any family member due to cell towers not working due to the fire. I finally heard from my mother that they were still alive later that day. I sustained significant emotional distress from the fire.

4. My mother and father had retained counsel to submit claims, and I mistakenly thought that I had counsel who would submit a claim for me in the bankruptcy. I did not realize this belief was mistaken until recently, well after December 31, 2019.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed at Chico, California, on July 23, 2020.


Morgan Engelbrecht